

SAO
MICHAEL C. KANE, ESQ.
Nevada Bar No. 10096

BRADLEY J. MYERS, ESQ.
Nevada Bar No. 8857

THE702FIRM

400 S. 7th Street, Suite 400

Las Vegas, NV 89101

Tel.: (702) 776-3333

Fax: (702) 505-9787

Email: service@the702firm.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CLARK COUNTY, NEVADA**

CHELSEA ROBERTS, individually, and as heir of deceased G.E.D.; CHELSEA ROBERTS as the parent and legal guardian on behalf of G.E.D., deceased minor child; CHELSEA ROBERTS, as the parent and legal guardian of J.E.D., a minor, individually and as heir of MICHAEL DURMEIER,

Plaintiffs,

VS.

NYE COUNTY SHERIFF'S OFFICE, a subdivision of the STATE OF NEVADA; DEPARTMENT OF PUBLIC SAFETY, DIVISION OF NEVADA HIGHWAY PATROL, a political subdivision of the STATE OF NEVADA; BUREAU OF LAND MANAGEMENT, a political subdivision of the STATE OF NEVADA; NYE COUNTY DEPUTY BREANNA NELSON; BUREAU OF LANDMANAGEMENT OFFICER RYAN GALLAGHER; NYE COUNTY LIEUTENANT ALAN W. SCHRIMPF; NYE COUNTY DETECTIVE BROOKE GENTRY; NYE COUNTY DEPUTY MICHAEL MOKESKI; NYE COUNTY TRAINEE ISAAC CHAMPLIN; NYE COUNTY DETECTIVE DANIEL FISCHER; NEVADA HIGHWAY PATROL TROOPER LUKE STANG; NYE COUNTY, a County of State of Nevada; DOE OFFICERS, AGENTS, or the like I through X, inclusive; and ROE CORPORATIONS I through X, inclusive, ROE AGENCIES OR POLITICAL SUBDIVISIONS I -X.

Defendants.

Case No.: 2:22-cv-00398-RFB-EJY

**STIPULATION AND [PROPOSED]
ORDER MODIFYING BRIEFING
SCHEDULE ON DEFENDANT NYE
COUNTY OFFICERS' MOTION TO
DISMISS**

1 IT IS HEREBY STIPULATED by and between the parties hereto, Plaintiffs, CHELSEA
2 ROBERTS, individually, and as heir of deceased G.E.D.; CHELSEA ROBERTS as the parent
3 and legal guardian on behalf of G.E.D., deceased minor child; CHELSEA ROBERTS, as the
4 parent and legal guardian of J.E.D., a minor, individually and as heir of MICHAEL
5 DURMEIER, by and through their undersigned counsel, THE 702 FIRM, and Defendants,
6 BREANNA NELSON, ALAN W. SCHRIMPFF, BROOKE GENTRY, MICHAEL MOKESKI,
7 ISAAC CHAMPLIN, AND DANIEL FISCHER, by and through their undersigned counsel of
8 record, MARQUIS AURBACH, that the briefing schedule, regarding Defendants Breanna
9 Nelson, Alan W. Schrimpf, Brooke Gentry, Michael Mokeski, Isaac Champlin, and Daniel
10 Fischer's Motion to Dismiss. The parties, through their undersigned counsel, hereby stipulate
11 and agree as follows:

12 WHEREAS, on March 25, 2022, Defendants Breanna Nelson, Alan W. Schrimpf, Brooke
13 Gentry, Michael Mokeski, Isaac Champlin, and Daniel Fischer's filed their Motion to Dismiss
14 ("Motion");

15 Plaintiffs' undersigned counsel requested additional time to prepare their opposition to
16 Defendants' Motions from Defendants and Defendants agreed;

17 NOW, therefore, the parties hereby STIPULATE that Plaintiffs' Opposition to
18 Defendants Breanna Nelson, Alan W. Schrimpf, Brooke Gentry, Michael Mokeski, Isaac
19 Champlin, and Daniel Fischer's Motion to Dismiss will be due April 22, 2022 and Defendants'
20 Reply will be due May 6, 2022.

21 ///

22 ///

23 ///

24 ///

25

26

27

28

1 **IT IS SO STIPULATED.**

2 DATED this 6th day of April, 2022.

3
4 **THE702FIRM**

5 */s/ Michael Kane*

6 MICHAEL C. KANE, ESQ.
7 Nevada Bar No.: 10096
8 BRADLEY J. MYERS, ESQ.
9 Nevada Bar No.: 8857
10 400 S. 7th Street, Suite/Floor 4
11 Las Vegas, Nevada 89101
12 E-Mail: service@the702firm.com
13 Attorneys for Plaintiffs

DATED this 6th day of April, 2022.

MARQUIS AURBACH

/s/ Susan Gillespie

BRIAN R. HARDY, ESQ.
Nevada Bar No. 10068
SUSAN E. GILLESPIE, ESQ.
Nevada Bar No. 15227
10001 Park Run Drive
Las Vegas, Nevada 89145
bhardy@maclaw.com
sgillespie@maclaw.com
Attorneys for Defendants Breanna Nelson,
Alan W. Schrimpf, Brooke Gentry, Michael
Mokeski, Isaac Champlin, and Daniel Fischer

DATED this 6th day of April, 2022.

THE SIMON LAW GROUP

/s/ Greyson Goody

GREYSON M. GOODY, ESQ.
California Bar No. 292527
(admitted pro hac vice)
34 Hermosa Avenue
Hermosa Beach, CA 90254
Attorney for Plaintiffs

ORDER

IT IS SO ORDERED this 6th day of April , 2022.

RICHARD F. BOULWARE, II
United States District Court